

DECLARATION OF YESSENIA I. VENTURA

I, Yessenia I. Ventura, hereby declare as follows:

1. In January 2009, I began working for Chase as a teller. In June 2012, Chase promoted me to an Assistant Branch Manager (“ABM”). From June 2012 until December 2014, I worked in Chase’s Meyerpark Branch located in Houston, Texas. In December 2014, I was transferred to Chase’s South Gessner and 59th Branch, also located in Houston Texas. I remain at this location today. The facts set forth in this declaration are based on my personal knowledge.

2. I definitely am a manager as an ABM. When I got promoted from teller, my job duties changed significantly and I went through training on managerial duties. I also received a substantial increase in pay as compared to what I was making as a teller even including overtime.

3. As an ABM, I supervise the bank tellers at my branch. Currently, that consists of two full-time and four part-time tellers.

4. This starts with the hiring process; something I am heavily involved in. Once my District Manager approves the position, I create the job posting myself. I then review the résumés and applications received in response to the posting and let my Branch Manager know who I believe are potentially good candidates. My Branch Manager and I interview the candidates together. At the conclusion of the interview process, my Branch Manager will ask me who I would like to select and we will make the final decision together. My Branch Manager has never selected anyone other than the candidate I recommended.

5. When a new hire begins, I am responsible for the on-site on-boarding process. I ensure that the new hire completes the Chase online training and answer any questions he or she may have about Chase’s policies and procedures. I also provide in-person training on a range of issues, such as what to look for when making a deposit and/or withdrawal, explaining the differences between an account holder and a customer, and branch opening and closing procedures.

6. I make the schedule for my tellers. I use a computer program to tell me the expected branch volume for that particular time period, and then schedule enough tellers to provide proper coverage. When choosing which tellers to schedule on a specific day, I am mindful of rotating the tellers on Saturdays and accounting for teller vacations. I also need to make changes to the schedule as circumstances change. For example, if a teller I had scheduled calls out sick, I need to find a replacement or adjust the schedules of other tellers. I do not need Branch Manager approval to issue or change the teller work schedule.

7. I approve and deny time-off requests for the tellers without Branch Manager input. In making this decision, I consider the staffing needs of the branch. I also review the timesheets for my tellers and approve them for payment, including all overtime.

8. I assign tellers to specific tasks and direct their work throughout the day. For example, I decide which teller will work the teller windows in the lobby and which others will work in the drive-up teller line. When there are no customers present, I assign other tasks to tellers such as refilling deposit slips in the lobby and at the teller windows.

9. I complete performance reviews for my tellers and decide their overall rating. I discuss my ratings with my Branch Manager, but my Branch Manager has never changed any of the overall ratings I issued to my team.

10. I also am responsible for managing all branch operations. This includes training branch employees on fraud and money laundering prevention and ensuring they understand and are in compliance with all applicable policies and procedures, including those relating to regulations applicable to the branch. To do this, I regularly quiz both tellers and bankers on compliance issues. If a banker or teller gives a wrong answer, I coach them on the correct answer.

11. As part of my responsibilities for managing teller operations, I conduct unannounced audits of my tellers' cash boxes. Specifically, I count the teller's cash box to make certain it matches the amount specified in Chase's computer system. If a cash box is short, I counsel the teller. In some cases, I will issue discipline to the teller.

12. Also, as a part of management, I perform tasks such as waiving Chase charges on customer accounts and approving exceptions to Chase policies and procedures. If I make an exception, I am agreeing to take full responsibility for the entire transaction. This means that if the bank incurs any loss because of my decision, the loss itself will be booked to the branch's cost center as a policy exception/violation loss, and I may be disciplined.

13. I also address and resolve escalated customer issues with both tellers and bankers.

14. Additionally, I work on the teller line assisting customers. I decide when and for how long to do this based on traffic flow for the day and branch staffing. During this time, tellers still approach me about issues they are experiencing with a customer or to answer a question. I also continue to observe and supervise my tellers while assisting customers on the teller line.

15. From April 2015 until July 2015, I served as Acting Branch Manager at my branch because the Branch Manager role was vacant. In this role, I performed all of my ABM duties, as well as Branch Manager duties such as supervising and managing the bankers.

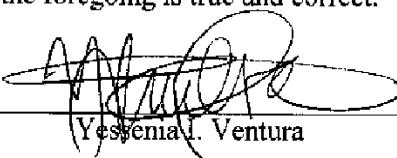
16. As an ABM, management and supervisory duties are my most important job duties. Although the amount of time I spend on supervisory and managerial duties varies, more often than not this is a majority of my time.

17. I am aware that a lawsuit has been brought against Chase claiming that ABMs were misclassified as exempt from overtime requirements and should be paid overtime, that I could be invited to join that case as a plaintiff or class member.

18. I have not been coerced or threatened in any way to give the information in this declaration. I understand that I did not have to give this declaration, can provide or refuse to provide a declaration or testimony, and know that giving information in this declaration is not a condition of my employment with Chase. I attest to the information in this declaration voluntarily and of my own free will.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 18, 2015


Yesenia I. Ventura